

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Plaintiffs,

v.

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

Civ. Action No.: 14-cv-00029-AB

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER<sup>1</sup>**

This Stipulation and Agreement, dated March [ ] 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

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<sup>1</sup> Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Players Joseph Horn and Christopher McAlister (ECF No. 6533);

WHEREAS, Joseph Horn and Christopher McAlister have since submitted written requests seeking to revoke their Opt Out requests (*see* Exhibit 1 (Declaration of Orran L. Brown, Sr.));

WHEREAS, the Parties have agreed to accept the revocation requests submitted by Joseph Horn and Christopher McAlister, subject to Court approval, because they submitted the requests before Opt Out litigation has commenced in this Court;

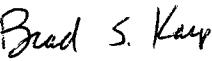
**AND NOW**, this [ ] day of March, 2017, it is hereby stipulated and agreed by the Parties that the revocation requests submitted by Joseph Horn and Christopher McAlister are accepted, subject to Court approval, because they submitted the requests before Opt Out litigation has commenced in this Court.

**It is so STIPULATED AND AGREED,**

By:   
\_\_\_\_\_  
Christopher Seeger

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Date: 3/10/17

By:   
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Brad S. Karp

Date: 3/10/17

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*Class Counsel*

*Counsel for the NFL Parties*

It is so **ORDERED**, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation requests submitted by Joseph Horn and Christopher McAlister are approved and the Claims Administrator is **DIRECTED** to post a revised list of Opt Outs forthwith excluding Joseph Horn and Christopher McAlister.

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ANITA B. BRODY, J.

Copies **VIA ECF** on \_\_\_\_\_ to:

Copies **MAILED** on \_\_\_\_\_ to: